UNITED STATES DISTRICT COURT
NORTHERN DISTRICT COURT OF NEW YORK

RAVEN MALCORVIAN,

Plaintiff,

**NOTICE OF MOTION**
**DEFAULT JUDGMENT**

-against-

**Civil Case No.: 1:16-cv-01270-TJM-CFH**

REGENERON PHARMACEUTICALS, INC.
Defendants.

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PLEASE TAKE NOTICE, that upon the Declaration of PATRICK SORSBY ESQ, dated 20th day of February, 2017, and upon the summons and complaint heretofore served herein, with proof of service thereof, with all of the various exhibits affixed hereto, Plaintiff through her attorney The Law Office of Patrick Sorsby PLLC, will move this Court before the Honorable Sr. District Judge Thomas J. McAvoy pursuant to Fed. R. Civ. P. 55(b) (2) at the courthouse, located at the Federal District of Northern New York in Albany County, on the __10th___day of April, 2017, at 10:00 am of that day, or as soon thereafter as counsel can be heard, for an order directing the entry of judgment in favor of the Plaintiff and against the Defendant REGENERON PHARMACEUTICALS, INC. for the relief demanded in the complaint, upon the ground that Defendant has failed to appear, plead or proceed to trial on the above-captioned matter, and for such other and further relief that may be just, proper, and equitable.

Dated : February 20, 2017

LAW OFFICE OF PATRICK SORSBY PLLC

By____S/_________________

Patrick Sorsby
Attorney for the Plaintiff
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT COURT OF NEW YORK

RAVEN MALCORVIAN,

Plaintiff,

**DECLARATION IN SUPPPORT OF MOTION FOR DEFAULT JUDGMENT**

-against-

**Civil Case No.: 1:16-cv-01270-TJM-CFH**

REGENERON PHARMACEUTICALS, INC.
Defendants.

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The undersigned, PATRICK SORSBY, ESQ, declares the following to be true under the penalty of perjury:

1. I am the attorney for the plaintiff in the above entitled action and am fully familiar with all the facts and circumstances heretofore had herein.

2. The above entitled action was brought for Disability Discrimination under the American with Disabilities Act in violation of Title VII and the New York Human Rights Law.

3. The above entitled action was commenced against the Defendant by personal delivery of the summons and complaint to the New York State Secretary on the 12th day of December, 2016. A copy of the Summons and Complaint served upon the Defendants by way of personal delivery to the New York Secretary of State is affixed hereto as "Exhibit A". A copy of the Affidavit of Service upon the New York Secretary of State is affixed hereto as "Exhibit B".

4. Defendant has not contacted the declarant in any way nor has it served an answer or moved with respect to the complaint herein nor has their time to do so been extended.

5. Defendant Regeneron Pharmaceuticals is now in default in pleading.

6. No previous application for the relief herein prayed for has been made.

7. Pursuant to Local Rule 55.1 on January 20, 2017, upon review of Plaintiffs request for an Entry of Default and finding the same satisfactory, the Clerk of the Court filed an Entry of Certificate of Default (Docket # 9). Docket # 9 the Clerks Certificate of Default is Affixed hereto as "Exhibit C".

8. Pursuant to Local Rule 55.2 (b) the Proposed Form of Default Judgment is Affixed hereto as “Exhibit D”

**WHEREFORE**, deponent respectfully asks for an order directing the entry of judgment in favor of the plaintiff and against the defendant for the relief demanded in the complaint and pursuant to FRCP 55(b)(2)(B) directing the assessment of damages to be determined by conducting a hearing (preserving any statutory right to a jury trial) and for such other relief that the Court deems just and proper including costs and attorneys fees.

Dated: February 20, 2017

LAW OFFICE OF PATRICK SORSBY PLLC

By____S/__________________
Patrick Sorsby
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